

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Sevan Gorginian, Esq. (SBN 298986) Law Office of Sevan Gorginian 450 N. Brand Blvd. Suite 600 Glendale, CA 91203 T: 818-928-4445 <input type="checkbox"/> <i>Individual appearing without attorney</i> <input type="checkbox"/> <i>Attorney for: Defendant</i>	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO VALLEY DIVISION	
In re: LUSINE DOKUZYAN <div style="text-align: right;">Debtor(s).</div>	CASE NO.: 1:22-bk-10283-MB ADVERSARY NO.: 1:22-ap-01028-MB CHAPTER: 7
HOVANES TONOYAN <div style="text-align: center;">vs.</div> LUSINE DOKUZYAN <div style="text-align: right;">Plaintiff(s).</div> <div style="text-align: right;">Defendant(s).</div>	<div style="text-align: center;"> JOINT STATUS REPORT [LBR 7016-1(a)(2)] </div> <hr/> DATE: 08/31/2022 TIME: 2:30 p.m. COURTROOM: 303 ADDRESS: 21041 Burbank Blvd. Woodland Hills, CA 91367

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

A. PLEADINGS/SERVICE:

- | | | |
|---|---|--|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):

For # 2, the Defendant accepts services of the Complaint through her counsel of record who is on ECF. The Defendant has not filed and served a formal answer; however, Defendant did file a Motion to Dismiss which will be heard concurrently with the status conference. If the Court denies the Motion to Dismiss, then the Defendant respectfully asks for 14 days to file her Answer.

3, the parties may bring pretrial motions to address the Claims Documents.

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?

Plaintiff

Defendant

February 2023

December 2022

2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.

Plaintiff

Defendant

Plaintiff is out of the country and returning October 2022. Plaintiff will file motions to continue the pleading

3. When do you expect to complete your discovery efforts?

Plaintiff

Defendant

December 2022 to January 2023

November 2022

4. What additional discovery do you require to prepare for trial?

Plaintiff

Defendant

Interrogatories, Document Production/Inspection, Land or Property Entry, RFAs, Oral and Written Deposition, Mental examination of Defendant.

Written discovery

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?

Plaintiff

Defendant

2 to 4 hours

4 hours

2. How many witnesses do you intend to call at trial (*including opposing parties*)?

Plaintiff

Defendant

Up to 25 (many are corporate entities who would just provide testimony at hearing or deposition, or provide documents.

2-3

3. How many exhibits do you anticipate using at trial?

Plaintiff

Defendant

Up to 50 Exhibits

5-7 Exhibits

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff

Pretrial conference ☒ is ☐ is not requested
Reasons:

Defendant

Pretrial conference ☒ is ☐ is not requested
Reasons:

Plaintiff

Pretrial conference should be set after:
(date) 01/01/2023

Defendant

Pretrial conference should be set after:
(date) 11/30/2022

E. SETTLEMENT:

1. What is the status of settlement efforts?

Plaintiff is open to settlement but no offers have been made.

2. Has this dispute been formally mediated? ☐ Yes ☒ No
If so, when?

3. Do you want this matter sent to mediation at this time?

Plaintiff

☒ Yes ☐ No

Defendant

☐ Yes ☒ No

FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

☒ I do consent
☐ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

Defendant

☒ I do consent
☐ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)

H.J.T.
PLAINTIFF'S STATEMENT Plaintiff living in another country from December 2021 and moving back to Los Angeles by October 2022. Requests continuance, extensions to file/serve, and to electronically file. wants order assigning matter to mediation, and appointment of Counsel for low cost/pro bono or limited scope due to these extraordinary circumstances. Requests clerk accept filings if timely, and defer production of original, wet signature pages to after October 2022. Requests at least 1 leave to amend for complaint, and leave to file supplemental pleadings for events after 06/24/22.

DEFENDANT'S STATEMENT

Defendant requests the Court to continue the status conference and not set any deadlines as to discovery, mediation or pretrial conferences at this time pending the resolution of the Defendant's Motion to Dismiss. If the Court grants the Motion to Dismiss, then no further status conferences are necessary. If the Court denies the Motion to Dismiss with leave to amend, then the Defendant would like an opportunity to file another dismissal motion as to any amended complaint filed by Plaintiff. Defendant's counsel is working practically pro bono and wants to preserve time and resources. As such, it is in the best interest to merely continue the status conference to trail the Court's decision on the Motion to Dismiss and any possible time for Plaintiff to file an amended complaint. Discovery should also be stayed until that time.

Respectfully submitted,

Date: 08/09/2022

Printed name of law firm

Signature

Jovanes Torroyan
Printed name

Attorney for: Pro Per

original, wet signature in Plaintiff's possession outside of USA. H.J.T.
Blue ink. Plaintiff returns October 2022.

Date: 08/09/2022

Law Office of Sevan Gorginian
Printed name of law firm

/s/ Sevan Gorginian
Signature

Sevan Gorginian
Printed name

Attorney for: Defendant

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

A true and correct copy of the foregoing document entitled: **JOINT STATUS REPORT [LBR 7016-1(a)(2)]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 08-16-2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Amy L Goldman (TR)
marisol.jaramillo@lewisbrisbois.com, AGoldman@iq7technology.com;ecf.alert+Goldman@titlexi.com

Sevan Gorginian on behalf of Defendant Lusine Cristine Dokuzyan
sevan@gorginianlaw.com, 2486@notices.nextchapterbk.com;ani@gorginianlaw.com

United States Trustee (SV)
ustpreion16.wh.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL *(state method for each person or entity served)*: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* 08-16-2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service by email to Plaintiff by consent

hoviktonoyan@gmail.com

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

08-16-2022	Sevan Gorginian	/s/ Sevan Gorginian
<u>Date</u>	<u>Printed Name</u>	<u>Signature</u>

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